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March 20, 2015

Via ECF

Honorable Joanna Seybert
Alfonse M. D'Amato Federal Building
United States District Court
100 Federal Plaza
Central Islip, NY 11722

Re: Anne-Marie Padilla v. Lakeview Rehabilitation and Care Center, et al.
Case No.: 14-cv-01976


Your Honor:

We represent the plaintiff in the above-referenced matter. The parties have executed a proposed Settlement Agreement and General Release ("Agreement") in this action, which involves causes of action under the Fair Labor Standards Act of 1938 ("FLSA"). Because the lawsuit involves FLSA claims, judicial review of the Agreement is required. We therefore are filing separately the proposed Agreement for the Court's review. We respectfully request that Your Honor review the Agreement. If the Agreement is acceptable, we respectfully ask that Your Honor so-order the Stipulation of Dismissal with Prejudice, which the parties filed on February 20, 2015.

It is also necessary that we bring an additional issue to the Court's attention. Plaintiff currently is experiencing a family emergency, and she requires the settlement funds immediately to address the problem. We therefore respectfully request that the Court review this Agreement as expeditiously as possible. We have contacted opposing counsel to advise defendants of this issue, and they consent to our request for an accelerated resolution of this matter.

Your Honor's most favorable consideration herein is greatly appreciated.

Respectfully Submitted,


Paul J. Sagar

cc: Alex Villanueva (Jackson Lewis LLP) via ECF